Linda S. Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, California 91201

Arnold Schwarzenegger
Governor

April 20, 2007

Mr. Greg Fiol
Project Manager
ARCADIS US, Inc
1400 North Harbor Boulevard, Suite 700
Fullerton, California 92835

LOS ANGELES CHEMICAL SITE, 4545 ARDINE STREET, SOUTH GATE, CALIFORNIA

Dear Mr. Fiol:

The Department of Toxic Substances Control (DTSC) has reviewed the "Remedial Investigation Workplan "dated March 26, 2007 and the "Sampling and Analysis Plan" dated March 28, 2007. DTSC hereby approves the workplan.

Enclosed please find DTSCs comments, which must be addressed in the Remedial Investigation Report. Please notify DTSC at least one week prior to the commencement of field activities.

If you have any questions, please call Ms. Poonam Acharya, Project Manager, at (818) 551-2948 or me, at (818) 551-2831.

Sincerely,

Rita Kamat
Unit Chief
Southern California Cleanup Operations Branch - Glendale Office

cc: Mr. Richard Montevideo
Rutan & Tucker
611 Anton Boulevard, Fourteenth Floor
Costa Mesa, California 92626-1931

Mr. William E. Huttner
Brenntag Pacific, Inc.
10747 Patterson Place
Santa Fe Springs, California 90670

cc: Mr. Peter Ramaley
Brenntag Pacific, Inc.
10747 Patterson Place
Santa Fe Springs, California 90670

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MEMORANDUM

TO: Poonam Aacharya, Project Manager
Hazardous Substances Engineer
Cleanup Operations Division,
Site Mitigation, Glendale Office

FROM: Steven A. Friet, PG, CEG
Engineering Geologist
Glendale Brownfields Revitalization Unit

CONCUR: John Naginis, PG
Senior Engineering Geologist
Glendale Geological Services Unit

DATE: April 19, 2007

SUBJECT: Comments for Remedial Investigation Workplan,
and Revised Sampling and Analysis Plan
Brenntag South Gate Site,
4545 Adrine Street, South Gate, California
Prepared by ARCADIS G&M, Inc., March 26 and 28, 2007

PCA: 11050 Site Code: 301287 Phase: 00

Introduction:

At your request, the Glendale Brownfields Revitalization Unit – geology staff performed a review of the Remedial Investigation Workplan (Document) and the Revised Sampling and Analysis Plan (SAP) prepared by ARCADIS G&M, Inc. (ARCADIS), dated March 26 and 28, 2007, respectively, for the above referenced site. As discussed, Brownfields Revitalization Unit – geology staff approves the currently proposed scope of work outlined in both the Document and SAP, provided the additional tasks outlined below are acknowledged as necessary for future characterization and monitoring activities at the site. Questions regarding this memo should be directed to Mr. Steven Friet at (818) 551-2178.

Vertical Delineation of the Fine Grained Lithologic Unit

In the March 28, 2007 transmittal letter accompanying the Document and SAP, ARCADIS requested specific guidance from the Department of Toxic Substances Control (DTSC) regarding investigation of the fine grained unit encountered at approximately 93 to 100 feet beneath the site. The analytical data shows volatile organic compound (VOC) impacts to groundwater above maximum contaminant levels (MCL's) throughout the water column to the top of this fine grained unit. In order to properly characterize the vertical extent of impacts to groundwater, it will be necessary to advance through this lithologic unit and complete groundwater monitoring wells screened within the aquifer below. This will also allow for both collection of soil samples for physical parameters and thickness determination of this unit.

Potential Offsite Migration of VOC South of the Site

As noted previously, for the purposes of the proposed investigation DTSC concurs with the collection of Hydropunch^{TM} groundwater samples from the proposed cone penetrometer test (CPT) borings in the downgradient locations (ASGC-1, ASGC-2, and ASGC-3) prior to making decisions to install additional groundwater monitoring wells. However, based on the fact that VOC impacts to groundwater above MCL's extend to the southern property boundary of the site, it is DTSCs position that offsite and downgradient groundwater monitoring wells in these areas will be necessary to properly characterize the lateral extent of groundwater impacts.